## IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

ALPHA ENERGY, a division of ALPHA	)
TECHNOLOGIES SERVICES, INC.	)
	) SX-17-CV-015
Plaintiff	)
v.	)
	) COMPLAINT FOR BREACH OF CONTRACT,
GEC, LLC, and CONTINENTAL	) Unjust Enrichment, And Claim
CASUALTY COMPANY	) AGAINST PAYMENT BOND
	)
Defendants	)
	)
GEC, LLC,	)
	) SX-18-CV-058
Plaintiff	)
v.	)
	) CLAIM AGAINST PERFORMANCE BOND
ARGONAUT INSURANCE	)
COMPANY	) JURY TRIAL DEMANDED
	)
Defendant.	)

## NOTICE OF DEPOSITION DUCES TECUM OF ROBERT G. LAVITT

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, and 34, Defendant GEC, LLC will take the deposition of Mr. Robert G. Lavitt on Wednesday, March 11, 2020 at 1:30 p.m. at the Offices of Dreifuss Bonacci & Parker, Five Penn Plaza, 23<sup>rd</sup> Floor, New York, New York 10001 for the purposes of discovery, or use in trial or later proceedings, or both.

This deposition will continue from day to day until completed.

Deponent Mr. Robert G. Lavitt is requested to produce at the deposition all items listed on Exhibit A.

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Respectfully submitted,

HUNTER & COLE Attorneys for GEC, LLC.

DATED: February 11, 2020

BY: /s/Warren B. Cole

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